

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION

WSOU INVESTMENTS, LLC D/B/A
BRAZOS LICENSING AND DEVELOPMENT,

Plaintiff,

v.

HEWLETT PACKARD ENTERPRISE COMPANY

Defendant.

Nos. 6:20-cv-00725-ADA
6:20-cv-00726-ADA
6:20-cv-00727-ADA
6:20-cv-00728-ADA
6:20-cv-00729-ADA

BRAZOS'S UNOPPOSED MOTION TO WITHDRAW
THE SECOND AMENDED COMPLAINTS WITHOUT PREJUDICE

Brazos respectfully submits this unopposed motion to withdraw without prejudice the five second amended complaints, filed on August 25, 2021, against existing defendant HPE and new defendant, New H3C Technologies Co., Ltd. (Case No. 6:20-cv-00725-ADA, Dkt. 54; -726, Dkt. 54; -727, Dkt. 54; -728, Dkt. 54; -729, Dkt. 53), which HPE contends are not yet operative or effective until Brazos seeks leave of Court (*see* Case No. 6:20-cv-00725-ADA, Dkt. 55, 56; -726, Dkt. 55, 56; -727, Dkt. 55, 56; -728, Dkt. 55, 56; -729, Dkt. 54, 55). HPE does not oppose this motion to withdraw the second amended complaints without prejudice. Accordingly, Brazos respectfully requests that the Court enter the proposed order filed herewith granting Brazos's withdrawal of its second amended complaints.

Respectfully submitted,

Dated: September 29, 2021

/s/ Raymond W. Mort, III

Raymond W. Mort, III
Texas State Bar No. 00791308
raymort@austinlaw.com
THE MORT LAW FIRM, PLLC
100 Congress Avenue, Suite 2000
Austin, Texas 78701

tel/fax: (512) 677-6825

David M. Stein
Texas State Bar No. 797494
dstein@brownrudnick.com
Sarah G. Hartman
California State Bar No. 281751
shartman@brownrudnick.com
BROWN RUDNICK LLP
2211 Michelson Drive, 7th Floor
Irvine, California 92612
telephone: (949) 752-7100
facsimile: (949) 252-1514

Alessandra C. Messing
New York Bar No. 5040019
amessing@brownrudnick.com
Timothy J. Rousseau
New York Bar No. 4698742
trousseau@brownrudnick.com
Yarelyn Mena
(admitted *pro hac vice*)
ymena@brownrudnick.com
BROWN RUDNICK LLP
7 Times Square
New York, New York 10036
telephone: (212) 209-4800
facsimile: (212) 209-4801

Edward J. Naughton
(admitted *pro hac vice*)
enaughton@brownrudnick.com
Rebecca MacDowell Lecaroz
(admitted *pro hac vice*)
rlecaroz@brownrudnick.com
BROWN RUDNICK LLP
One Financial Center
Boston, Massachusetts 02111
telephone: (617) 856-8200
facsimile: (617) 856-8201

Counsel for Plaintiff
WSOU Investments, LLC d/b/a
Brazos Licensing and Development